

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JANE DOE, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

DEVAL L. PATRICK, Governor of the
Commonwealth of Massachusetts;
**MASSACHUSETTS DEPARTMENT OF
CORRECTION; LUIS S. SPENCER**,
Commissioner of the Massachusetts
Department of Correction; and **LYNN
BISSONNETTE**, Superintendent of the
Massachusetts Correctional Institution at
Framingham,

Defendants.

Civil Action No. 1:14-cv-12813

SUPPLEMENTAL MOTION FOR LEAVE TO PROCEED PSEUDONYMOUSLY

For the reasons set forth in Plaintiff's Memorandum of Law in Support of Her Motion to Proceed Pseudonymously (Docket Entry 5), Plaintiffs hereby move for an Order granting Jane Doe 2 and Jane Doe 3 leave to proceed in this case under pseudonyms to prevent the public disclosure of their mental health status. Plaintiffs also respectfully request that the Court grant leave for any additional plaintiffs to be joined to this litigation to proceed under pseudonyms, as reflected in the Proposed Order accompanying this Supplemental Motion.

CERTIFICATION WITH RESPECT TO LOCAL RULE 7.1(A)(2)

Counsel for the Massachusetts Department of Correction, Commissioner Spencer, and

Superintendent Bissonnette assent to this motion. Counsel for Governor Patrick did not respond to communications requesting a meet and confer regarding this motion.

Dated: July 17, 2014

Respectfully submitted,

/s/ William F. Lee

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Certificate of Service

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on July 17, 2014.

/s/ William F. Lee
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